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FEDERAL COMMUNICATIONS COMMISSION Washington, DC 20554

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In the Matter of)
)
1998 Biennial Regulatory Review) WT Docket No. 98-182 /
47 C.F.R. Part 90 - Private Land Mobile) RM-9222
Radio Services	,)

COMMENTS ON PETITIONS FOR RECONSIDERATION

Filed by:
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Date: January 1, 2001

1. Background

I have been involved in building and experimenting with radios and electronic equipment since 1962, the year in which I constructed my first radio, a Heathkit one channel CB radio. From there I went on to construct test equipment, short wave receivers, and years later my first Ham Radio. In 1978 I passed my Novice Amateur Radio license and received my call sign KA4ANA. Six months later I passed the General portion of the test. I have never worked for the electronics industries in any fashion, nor do I have any financial ties to them.

One of my main interests in two-way radio is a desire to help people find new and better methods of communications. Two-way radios are one of the most effective and economical direct point-to-point communications. In my view two-way radios can become a "LIFE LINE" when an emergency occurs. I have lived in South Florida for over fifty years and I have been through many hurricanes. The worst was in 1992, when Hurricane Andrew struck and devastated South Florida. To this day Hurricane Andrew is the single most destructive and costly natural disaster to have occurred in the history of the United States. Every means of communications other than two-way radios were destroyed or disrupted. Most of the Amateur radio repeaters in Dade County were badly damaged or destroyed. It took several days just to get a few of the repeaters back on the air. Once they were back up and operating, they were operating at a reduced capability. In well over half of Dade County, there was no electrical power or telephone service and cell phone sites were down. It took over a week, for a few cell phone sites to begin working again and they were swamped with emergency calls. Debris blocked most streets. There was no way to find out if family and friends were ok or even if they were alive.

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Direct two-way radios, was the only means of communications. CB radios were about the only way for the average person to communicate with others in the affected areas. The Family Radio Service did not exist at this time. Even if the FRS had been available, with its limited range, it would have not been of much value. This is not to say that the FRS doesn't have its merits... it surely does. The FRS service has saved numerous lives and has led to the rescues of many in the short time it has existed and MURS will too. As I write this, I see on the T. V. news that we are experiencing one of the worst winters in over 100 years. Many people are again without electricity or telephone service. Many are stranded on impassable roads with no way to call for assistance. Some have died... MURS can help people radio for help in any type of emergency.

What does this have to do with MURS you may ask? My answer is EVERYTHING! MURS is one of the most effective methods of communication next to the telephone for the average person. When MURS was created by the F.C.C., it became an affordable, reliable, and effective means of commutating with one's family. I have been monitoring the five MURS frequencies since early August, when I first learned of the pending rule changes. I have heard only a few small businesses on these channels along with a few other people who now share these frequencies I have never heard a call sign or ID from any of these stations. I have never heard of any trouble with any parties who are using these frequencies, caused by interference or malice to each other. These frequencies are not being used very much by anyone in this area. I feel that by opening these frequencies to unlicensed use, no party will be hurt. Businesses still have frequencies that are reserved for licensed operations only.

2. My opposition or support of the Motorola Petition items:

- 1. The MURS name should not be changed. It reflects the true spirit of the service.
- 2. This service should continue to be, on a shared bases as the MURS rules state.
- 3. I agree with this proposal to prohibit interconnections to public telephone networks.
- 4. I disagree with this proposal of prohibiting integrating MURS units with FRS units.

3. My opposition or support of the PRSG Petition:

- 1. I agree with this provision, but only as it applies to the radio itself.
- 2. I do not agree with antenna height restrictions.
- 3. I agree with prohibiting repeaters.
- 4. I disagree with this provision. The name MURS is perfect.
- 5. I agree with the provision that standards should be simplified.
- 6. I agree that the interconnection with PSTN should be prohibited.

4. My Personal desires for changes of the MURS rules:

- 1. I would like to see an increase of power to 4 or 5 watts output, which would allow much of the existing equipment to be used.
- 2. I would like to see the use of gain antennas.
- 3. I would also like to see the existing rule section 95.1305 C, that allows a continuous carrier transmit mode, be eliminated. MURS has so few channels that this rule would cause unacceptable loss of use to possibly all channels in a given area.

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SERVICE LIST:

"I Albert Verdecia certify that on this date (January 2, 2001), I have sent a copy of these comments to the following parties:

Corwin D. Moore, Jr.
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[Sent electronically by petitioner's permission to: prsg@provide.net]

Richard C. Barth, Ph.D. Vice President and Director, Telecommunications Strategy Motorola 1350 I Street, N.W., Suite 400 Washington, DC 20005"

Respectfully yours,

Albert Verdecia